

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

JONATHAN I. GEHRICH, ROBERT LUND,  
COREY GOLDSTEIN, PAUL STEMPEL and  
CARRIE COUSER, individually and on behalf  
of all others similarly situated,

Plaintiffs,

v.

CHASE BANK USA, N.A., and JPMORGAN  
CHASE BANK, N.A.,

Defendants.

NO. 1:12-CV-5510

Honorable Gary Feinerman

**DECLARATION OF BETH E. TERRELL IN SUPPORT OF PLAINTIFFS' MOTION  
FOR FINAL APPROVAL AND RESPONSE TO OBJECTIONS**

I, Beth E. Terrell, declare as follows:

1. I am a member of the law firm of Terrell Marshall Daudt & Willie PLLC ("TMDW"), counsel of record for Plaintiffs in this matter. I am admitted to practice before this Court *Pro Hac Vice* and am a member in good standing of the bars of the States of California and Washington. I respectfully submit this declaration in support of Plaintiffs' Motion for Final Approval of Class Action Settlement in the above-captioned case. Except as otherwise noted, I have personal knowledge of the facts set forth in this declaration, and could testify competently to them if called upon to do so.

2. Following the execution of the Settlement Agreement, I took the deposition of a representative from Chase to ensure the accuracy of information that Chase provided regarding

the size of the Settlement Class and to ensure Chase had made reasonable efforts to identify Settlement Class members.

3. After additional data identifying the Settlement Class members was transmitted to the Claims Administrator, I took a second deposition of a Chase representative and confirmed that all data had been located and successfully transmitted.

4. Attached hereto as Exhibit A is a true and correct copy of a statement from the Consumer Federation of America.

5. Class Counsel do not have any personal connection to the Plaintiffs.

6. Plaintiff Barry Willis decided to settle his individual claims and not seek appointment as a class representative.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

EXECUTED at Seattle, Washington, this 8th day of October, 2015.

By: /s/ Beth E. Terrell, Admitted Pro Hac Vice  
Beth E. Terrell, Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I, Beth E. Terrell, hereby certify:

1. On October 8, 2015, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

Kenneth Michael Kliebard  
Email: kkliebard@morganlewis.com  
Tedd Macrae Warden  
Email: twarden@morganlewis.com  
MORGAN LEWIS & BOCKIUS LLP  
77 West Wacker Drive  
Chicago, Illinois 60601-5094  
Telephone: (312) 324-1774  
Facsimile: (312) 324-1001

Julia B. Strickland  
Email: jstrickland@stroock.com  
Lisa M. Simonetti  
Email: lsimonetti@stroock.com  
Arjun P. Rao  
Email: arao@stroock.com  
Julieta Stepanyan  
Email: jstepanyan@stroock.com  
STROOCK & STROOCK & LAVAN LLP  
2029 Century Park East Suite 1600  
Los Angeles, California 90067-3086  
Telephone: (310) 556-5800  
Facsimile: (310) 556-5959

*Attorneys for Defendants*

Christopher Perez-Gurri, *Admitted Pro Hac Vice*  
Email: chris@gpglawfirm.com  
Alan G. Geffin, *Admitted Pro Hac Vice*  
Email: alan@gpglawfirm.com  
GPG LAW  
101 NE 3rd Avenue, Suite 1110  
Ft. Lauderdale, Florida 33301  
Telephone: (954) 533-5530  
Facsimile: (954) 374-6588

*Attorneys for Objector Tamiqueca Dooley*

Norman T. Finkel, #6183246  
Email: norm.finkel@sfnr.com  
Daniel E. Beederman, #3121545  
Email: daniel.beederman@sfnr.com  
William R. Klein, #6185715  
Email: bill.klein@sfnr.com  
SCHOENBERG, FINKEL, NEWMAN & ROSENBERG, LLC  
222 S. Riverside Plaza, Suite 2100  
Chicago, Illinois 60606  
Telephone: (312) 648-2300  
Facsimile: (312) 648-1212

*Attorneys for Objector Tamiqueca Dooley*

Daniel M. Samson, *Admitted Pro Hac Vice*  
Email: dan@samsonappellatelaw.com  
SAMSON APPELLATE LAW  
201 S. Biscayne Boulevard, Suite 2700  
Miami, Florida 33131  
Telephone: (305) 341-3055  
Facsimile: (305) 379-3428

*Attorneys for Objector Tamiqueca Dooley*

C. Jeffrey Thut, #6188219  
Email: jeff@roachjohnstonthut.com  
ROACH, JOLMSTON & THUT  
516 N. Milwaukee Avenue  
Libertyville, Illinois 60048  
Telephone: (847) 549-0600  
Facsimile: (847) 549-0312

*Attorneys for Objector Kristina Lopez*

Jonathan E. Fortman  
Email: jef@fortmanlaw.com  
LAW OFFICE OF JONATHAN E. FORTMAN, LLC  
250 St. Catherine Street  
Florissant, Missouri 63031  
Telephone: (314) 522-2312  
Facsimile: (314) 524-1519

*Attorneys for Objector Steve Purgahn*

Steve A. Miller  
Email: sampc01@gmail.com  
STEVE A. MILLER, PC  
1625 Larimer Street, No. 2905  
Denver, Colorado 80202  
Telephone: (303) 892-9933  
Facsimile: (303) 892-8925

*Attorneys for Objector Steve Purgahn*

John C. Kress  
Email: jckress@thekresslawfirm.com  
THE KRESS LAW FIRM, LLC  
4247 S. Grand Blvd  
St. Louis, Missouri 63111  
Telephone: (314) 631-3883  
Facsimile: (314) 332-1534

*Attorneys for Objector Steve Purgahn*

Joseph Darrell Palmer  
Email: darrell.palmer@palmerlegalteam.com  
LAW OFFICES OF DARRELL PALMER PC  
2244 Faraday Avenue, Suite 121  
Carlsbad, California 92008  
Telephone: (858) 215-4064  
Facsimile: (866) 583-8115

*Attorneys for Objectors Dawn Weaver and Susan House*

2. I further certify that on October 8, 2015, I mailed by United States Postal Service the foregoing to the following non CM/ECF participants:

David Schlagel  
c/o John J. Pentz  
19 Widow Rites Lane  
Sudbury, Massachusetts 01776

*Attorneys for Objector David Schlagel*

Michael Narkin  
[REDACTED]  
Eugene, Oregon 97405

*Objector, Appearing Pro Se*

Sam P. Cannata  
[REDACTED]  
Cleveland, Ohio 44022

*Objector, Appearing Pro Se*

Cindy Bray  
[REDACTED]  
Springfield, Missouri 65804-3336

*Objector, Appearing Pro Se*

Nicholas Owen Gunden  
ORVANDI PROPERTY OR LLC  
[REDACTED]  
Walnut, California 91789

*Objector, Appearing Pro Se*

David H. Pierce  
DAVID H. PIERCE & ASSOCIATES, PC  
[REDACTED]  
Sherman Oaks, California 91403-3501

*Objector, Appearing Pro Se*

Ken Murphy  
[REDACTED]  
Denver, Colorado 80210

*Objector, Appearing Pro Se*

Maritza Cabrera  
[REDACTED]

Miami, Florida 33114-5395

*Objector, Appearing Pro Se*

David D. Dishman  
[REDACTED]

Swampscott, Massachusetts 01907

*Objector, Appearing Pro Se*

DATED this 8th day of October, 2015.

TERRELL MARSHALL DAUDT & WILLIE PLLC

By: /s/ Beth E. Terrell, Admitted Pro Hac Vice

Beth E. Terrell, *Admitted Pro Hac Vice*

Email: bterrell@tmdwlaw.com

936 North 34th Street, Suite 300

Seattle, Washington 98103-8869

*Attorneys for Plaintiffs*

**— EXHIBIT A —**



## CONSUMER FEDERATION OF AMERICA

The Consumer Federation of America (CFA) is a non-profit, 501(c)(3) organization that was founded in 1968 to advance the consumer interest through research, advocacy, and education. CFA's 290 member groups include major national consumer groups (e.g., Consumer Reports and National Consumer Law Center), more than 100 state and local consumer organizations, and more than 100 consumer cooperative groups. These CFA members elect CFA's 39-member board of directors and determine those public policy positions advocated by staff.

For several decades, CFA has been recognized as one of the nation's most influential consumer organizations. During this period, according to one study, CFA and Consumer Reports were each invited by the U.S. Congress to give testimony far more often than any other consumer group. A 2006 *Journal of Quarterly Economics* article on think tanks and policy groups revealed that CFA was the consumer group most frequently cited by news media.

In recent years, as indicated by information under "Issues" on CFA's website, [www.consumerfed.org](http://www.consumerfed.org), CFA has worked extensively in the areas of financial services, communications, consumer protection, and privacy. This work has included recent advocacy and education related to telemarketing and debt collection.

In the area of telemarketing, CFA's advocacy has included comments (August 2013) filed with others to the Federal Trade Commission on proposed amendments to the Telemarketing Sales Rule, a letter (January 2015) to the Federal Communications Commission urging the agency to maintain consumer protections under the Telephone Consumer Protection Act, and a letter (February 2015) urging the FCC not to allow robocalls to cell phones without consent. CFA's educational efforts in the area have included preparation and distribution of a guide to understanding your telemarketing rights, consumer tips to avoid telemarketing fraud, a ready-to-use telemarketing article, and a professionally prepared video on understanding your telemarketing rights and avoiding fraud. Every year, CFA surveys telemarketing and other consumer complaints, filed with dozens of state and local consumer protection agencies, and communicates advice about how consumers can remedy and avoid these problems. And because of increasing consumer concerns, at this year's March Consumer Assembly, CFA has organized a session on telemarketing abuse with panelists including the FTC's Director of Marketing Practices, FCC's Associate Bureau Chief of the agency's Enforcement Bureau, and a policy counsel to Consumer Reports. This conference, attended by several hundred advocates and protection officials from around the country, will also feature a keynote address by FTC Chair Ramirez.

CFA has also sought to reform debt collection practices. In May 2011, with Consumer Reports, it submitted extensive comments to the Federal Trade Commission on these practices and needed reforms. In May 2013, CFA joined with other groups in a letter urging the US. Senate to support legislation that would ensure fairer treatment for those families burdened with large medical debts. In July 2013, CFA issued a release on the

importance of actions by the Consumer Financial Protection Bureau in protecting consumers from abusive collection practices. And in December 2013, CFA issued a release with a list of consumer debt protection tips. Also in December 2013, CFA included a session on debt collection abuses and remedies, at its annual financial services conference, that included leaders from the Consumer Financial Protection Bureau and the Office of the Iowa Attorney-General. This conference also featured a keynote speech by CFPB Director Cordray, who discussed debt protection.

CFA would use a cy pres award to continue and expand its work in the areas of financial services, communications, consumer protection, and privacy, with particular focus on telemarketing, debt repayments, and debt collection. This expanded work, which would occur over a period of several years, would include national surveys of consumer knowledge and attitudes, research on consumer complaints, related briefings of advocates and mass media, communications with legislative and regulatory policymakers, and even more effective dissemination of information to consumers.